

RICHARD B. LIND, ESQ.
Attorney at Law
575 Lexington Avenue – 4th Floor
New York, NY 10022
Cellphone: (917) 747-9603 Email: rlind@lindlawyer.com

December 22, 2021

Via ECF

Hon. Philip M. Halpern
United States District Judge
U.S. Courthouse
300 Quarropas Street
White Plains, NY 10601

Re: United States v. Isaiah Santos
S6 20 Cr. 626 (PMH)

Dear Judge Halpern:

In mid-September, I was appointed CJA attorney to replace prior counsel and represent Defendant Isaiah Santos in the above-referenced matter. He is charged in Counts One (Racketeering Conspiracy), Count Sixteen (Racketeering Conspiracy), and Count Eighteen, (Brandishing a Firearm in Furtherance of Drug Trafficking Crime). I write to request an opportunity to make an application for bail on Isaiah's behalf at the earliest available opportunity.

In part, the bail package I will propose for the Court's consideration will contain the following:

1. Bond in the amount of \$150,000 - \$250,000, secured by six financially responsible co-signers, namely:
 - (i) Carmen Rios (paternal grandmother)
442 Springwood Court
Longwood, FL 32750
Phone number: (407) 431-2448
Home value: \$294,000
 - (ii) Gabriel Martinez (paternal uncle)
574 Eldron Avenue

Deltona, FL 32738
 (407) 360-0087
 Home value: \$242,800
 Employer: Progress Residential
 Salary: \$56,000; Title: "make-ready" Superintendent

(iii) Chalsy Miranda (mother)
 154 East 175 Street, Apt. A
 Bronx, NY 10457
 Salary: \$55,321
 Employer: NYC Dept. of Health and Mental Hygiene
 Title: Laboratory Technician II

(iv) Ashley Santos (sister)
 860 Columbus Avenue, Apt. 1D
 New York, NY 10025
 347-617-7923 (mobile)
 Position: Department Assistant
 Salary: \$34,000
 Currently completing Bachelor of Social Work
 @ Lehman Community college, Bronx, NY

(v) Andre Santos (brother)
 154 East 175 Street, Apt. A
 Bronx, NY 10457
 321-295-3830
 Employer: Chipotle Mexican Grill
 Position: Service Manager
 Salary: \$40,000

(vi) Amaris Santos (sister)
 Employer: Aster OB/GYN
 240 West 98th Street, Apt 1E
 New York, NY 10025
 212-662-6100
 Position: Receptionist
 Salary: \$30,000

As can be seen, Ms. Rios and Mr. Martinez are also willing to post their houses as security for bail purposes.

In addition, it should be noted, that Isaiah, who recently turned 20 years of age, has never been convicted of a crime. He moved to New York City in 2007. He was attending Edward A. Reynolds High School in upper Manhattan from first grade to 11th grade and received an "EP" (individualized education plan. In addition, Isaiah received SSI disability income for a mental disability until he was 18 years old

Thank you for the Court's consideration of this application.

Respectfully submitted,
/s/

Richard B. Lind

cc: All Counsel (by ECF)